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ASPEN SPECIALTY INSURANCE
COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ASPEN SPECIALTY INSURANCE
COMPANY,

Plaintiff,

v.

CHIEF CONCRETE, INC. and DOES 1 to 100,
inclusive,

Defendants.

CASE NO. 2:13-cv-00252-GMN-PAL

**STIPULATION AND ORDER TO
EXTEND PRETRIAL DEADLINES**

(FIRST REQUEST)

Plaintiff, ASPEN SPECIALTY INSURANCE COMPANY, by and through its counsel GALINA KLETSER JAKOBSON of SELMAN BREITMAN LLP and Defendant CHIEF CONCRETE, INC., by and through its attorney, TYLER J. WATSON of KRAVITZ, SCHNITZER, SLOANE & JOHNSON, CHTD., hereby stipulate to extend by 90 days the current pretrial deadlines, to include deposition discovery, the deadline for dispositive motions and the submission of the pretrial order. This extension is requested because the parties need additional time to meet and confer regarding responses to written discovery requests and schedule depositions to properly understand the facts, circumstances and issues of this case.

Based on this stipulated agreement, the parties request that all current discovery dates be extended by 90 days. The parties propose the following deadlines:

1. Discovery cutoff: December 27, 2013;
2. Dispositive motions: January 27, 2014;
3. Pretrial order: February 27, 2014, unless dispositive motions are filed which will extend the date to file the pretrial order until 30 days after the decision on the dispositive motions, or upon further order by the court extending the time period in which to file the joint pretrial order.

There is no trial date currently set.

This request is sought in the interest of justice and not for the purposes of delay. None of the parties will be prejudiced by this requested extension.

DATED: September 6, 2013

SELMAN BREITMAN LLP

By: /s/ Galina Kletser Jakobson
 ELAINE K. FRESCH, ESQ.
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DATED: September 6, 2013

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By: /s/ Tyler J. Watson
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 Attorneys for Defendant

ORDER

IT IS SO ORDERED.

 U.S. DISTRICT COURT JUDGE

DATED: _____

Selman Breitman LLP
 ATTORNEYS AT LAW